

Comment Number	Page Number	Line, Figure, or Table No.	Commentor	Comment	
1	WQ Program, p.8	Table 1-WQ Parameters Of Concern to Beneficial Uses	Stephen P. Hayes, ESO	Under "Metals & Toxic Elements", you <u>may</u> want to add the trace metals arsenic, chromium, and lead to the table since they appear to be more of a concern in drinking water than copper and zinc which were listed. The Department of Health Services has established Primary Drinking Water Standards ( <u>based on human health concerns</u> ) for arsenic, chromium, and lead (as well as cadmium and mercury which were listed in the table). DHS has established Secondary Drinking Water Standards ( <u>based on taste, odor, and appearance concerns only</u> ) for copper and zinc. I recognize that Compliance water quality monitoring detects these trace metals at levels far (ten to a hundred fold) below the applicable Standard because of the insolubility of many of the salts of these trace metals in water. However, this relative insolubility can make these trace metals (especially lead) a hazard in sediment. As stated on p. 10, "...achievement of numerical water quality objectives alone may not be enough to ensure good water quality for ecosystem beneficial uses."	P
2	WQ Program, p.8	Table 1-WQ Parameters of Concern to Beneficial Uses	Stephen P. Hayes, ESO	Under "Organics/Pesticides", the triazine herbicide simazine should be considered for inclusion. Simazine has been used within the drainages to the Bay-Delta System in the spring to control broadleaf weeds and annual grasses in berry fruit, vegetable, and ornamental crops, and in orchards and vineyards. This pre-emergence herbicide has occasionally been detected through Compliance water quality monitoring at levels above EPA's Lifetime Health Advisory of 1.0 µg/L for simazine in drinking water.	

3	WQ Program, p.9	Table 3- Summary of Water Quality Program Actions by Region	Stephen P. Hayes, ESO	Renumber as Table 2" Need to emphasize the "Mine Drainage" problem within the Delta as primarily a sediment problem rather than as a water column problem. Compliance water quality monitoring monitoring stations on the Sacramento and San Joaquin Rivers show low levels of trace metals that are within the range of values measured at the internal Delta stations. Regulated point discharges to the Bay-Delta System from more nearby sources could be a more current and significant source for trace metals in the water column.	
4	WQ Program, pp.8-9	"mercury" discussion	Stephen P. Hayes, ESO	Mercury has not been detected in Compliance water quality monitoring trace metal samples because many mercury salts are highly insoluble in water, except under anaerobic conditions. Therefore, if mercury in the water column is to be studied, possibly concentrate the studies in areas of minimal tidal mixing, high BOD, etc. Because of the insolubility of the salts of mercury, this trace metal can build up within the sediment. Therefore sediment and aquatic organism tissue burden studies should also be conducted (especially on bottom feeders that may directly or indirectly ingest mercury laden sediment).	
5	WQ Program, p.10	Discussion of "Numerical Water Quality Objectives (upper right quarter of page)	Stephen P. Hayes, ESO	Good discussion!!! This discussion would support the inclusion of the items I recommended in my previous comments.	

6	WQ Program, p. 23	Action 6	Stephen P. Hayes, ESO	A seasonal non-point source of some of the nutrients to the Delta region is the winter/spring flush of nutrients from the drainages to the Delta. Some of these nutrients (from non-agricultural sources) would not be accounted for in the prescribed procedures to control nutrient input through source control of agricultural surface drainage.	
7	WQ Program, p. 51	Mine Drainage, first paragraph	Stephen P. Hayes, ESO	Toxic effects of metals contained in the sediment, not waters of the Delta and Sacramento River regions. Text should be revised to reflect this.	
8	WQ Program	Whole Report	Stephen P. Hayes, ESO	Report (p.8, Table 1, under "Other") mentions "dissolved oxygen" as a parameter of concern, yet does not discuss it's impact in detail within the Bay-Delta System (especially in the eastern Stockton Ship Channel where levels can drop to < 5.0 mg/L in the late summer/early fall). BOD loadings to the System (especially in the lower San Joaquin River) should also be considered and discussed.	

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1	ERPP Vol 1, 13	Table 1, Last Line	S. Spaar	Move 'Stressors' heading to top page 14.	
2	ERPP Vol 1, 14	Table 1, Mid-page	S. Spaar	'Gravel Mining' - This vision should probably include reducing predation on salmonid smolts and improving the salmonid migratory pathways. These are adversely effected by instream gravel mining, as is water temperature. As written, it appears that only spawning habitat and floodplain is impacted by mining.	
3	ERPP Vol 1, 15	Table 1, Mid-page	S. Spaar	'Artificial Fish Propagation' - This stressor appears to lack a stated vision. The vision indicates it is closely linked to other visions, but does not explain what the vision is for this stressor.	
4	ERPP Vol 1, 20	Table 4	S. Spaar	<p>'Natural Sediment Supply' - The San Joaquin River (12) is not included, yet the Sacramento River is. On p. 29 (col. 2, para. 2), the San Joaquin River is noted as an area where ecosystems have been significantly modified by sediment transport and deposition processes. Actions are also proposed for possible meander belts on the SJ River.</p> <p>Is there an explanation somewhere of why the SJ River is not marked on the table? If so, might include a note with the table as to where this could be found.</p> <p>'Stream Meander' - Similar comment for the Eastside Delta Tributaries (11). Is stream meander not an ecosystem process of concern for the Mokelumne and Consumnes rivers, and other</p>	

				streams?	
5	ERPP Vol 1, 130	Table 10	S. Spaar	'White and Green Sturgeon' - No programmatic actions are proposed for these species on the San Joaquin River? Might include the reasoning in the species section p. 146-148.	
6	ERRP Vol 2, 447	SJRMP, last sentence	Dale Hoffma- Floerke	The SJRMP is not being managed by any particular agency.	

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